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18 Attorney for Plaintiff
19 BRADFORD TECHNOLOGIES, INC.

20 UNITED STATES DISTRICT COURT

21 NORTHERN DISTRICT OF CALIFORNIA

22 BRADFORD TECHNOLOGIES, INC.,) Case No. 3:11-CV-04621 (EDL)
23 Plaintiff,)
24 v.) STIPULATION AND ORDER TO
NCV SOFTWARE.com, et al.,) CONTINUE CASE MANAGEMENT
Defendants.) CONFERENCE FOR 60 DAYS
AS MODIFIED
)

1 WHEREAS, the Court entered a Stipulated Order Regarding Defendants Karma
2 Technologies, LLC's And John David Biggers' Motion For An Order To Show Cause Why
3 Plaintiff, Jeffrey Bradford And Roger Wintle Should Not Be Held In Contempt of Court And For
4 Further Relief And Sanctions on December 6, 2012 (the "Sanctions Order");
5

6 WHEREAS, pursuant to the Sanctions Order, Defendants are conducting expedited
7 discovery concerning their three source code discs and the extent to which they were accessed,
8 reviewed, copied, downloaded and/or saved by Bradford Technologies, Inc., Jeffrey Bradford
9 and/or AppraisalWorld, Inc., in violation of the Stipulated Protective Order in this matter;

10 WHEREAS, in anticipation of the completion of the foregoing expedited discovery
11 within two (2) months, the Court scheduled a case management conference for February 19,
12 2013, at 10:00 a.m.;

13 WHEREAS, Defendants have not yet been able to complete the expedited discovery
14 contemplated by the Sanctions Order due, in part, to the fact that Defendants' retained,
15 independent expert was not given access to Mr. Bradford's personal laptop until January 21,
16 2013, to obtain a forensic image for analysis:

17 WHEREAS, Defendants' independent experts need additional time to complete their
18 analyses, and Defendants need additional time to schedule and conduct relevant depositions once
19 the experts finish their analyses;

20 WHEREAS, to permit Defendants sufficient time to conduct and complete their
21 expedited discovery, the parties wish to continue the case management conference scheduled for
22 February 19, 2013, by approximately sixty (60) days;

23 IT IS HEREBY STIPULATED and AGREED by and between the foregoing parties in
24 this matter, through their respective counsel of record, as follows:
25
26
27
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23 at 3:00 p.m.

1. The case management conference should be continued until April 22, 2013, to permit Defendants to complete the expedited discovery contemplated by the Sanctions Order, and for their experts to complete their analyses.

2. Any party may request an order from the Court to expedite the case management conference, or to otherwise seek expedited relief from Court, for good cause.

IT IS SO STIPULATED.

Dated: February 11, 2013

ANDERSON & KARRENBERG, P.C.

By: /s/ Heather M. Sneddon

- and -

GREENBERG TRAURIG, LLP
Kurt A. Kappes
Greg Sperla

Attorneys for Defendants
KARMA TECHNOLOGIES, LLC
JOHN DAVID BIGGERS

Dated: February 11, 2013

THE HERITAGE LAW GROUP

By: /s/ Jill Schachter

Attorneys for Plaintiff
BRADFORD TECHNOLOGIES, INC.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

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